

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARINA ESPÍRITU, et als,

Plaintiffs,

v.

COMISIÓN ESTATAL DE ELECCIONES
and JESSIKA PADILLA RIVERA, in her
official capacity as Alternate President of the
Comisión Estatal de Elecciones, et als,

Defendants.

CIVIL NO. 24-CV-01446 (MAJ)

**TEMPORARY RESTRAINING
ORDER REQUESTED**

MOTION IN COMPLIANCE WITH COURT'S ORDER

TO THE HONORABLE COURT:

COME NOW the Plaintiffs through their undersigned attorneys and respectfully allege and
pray:

1. On September 24, 2024, the Court ordered the parties to state their position as to whether the Preliminary Injunction, set for Friday, September 27, 2024, should be consolidated with a Trial on the Merits.

2. Considering the urgency of the issues raised in this *preliminary injunction*, all Plaintiffs agree to consolidate the Preliminary Injunction with the Trial on the Merits set for this Friday.

3. Plaintiffs will be providing a certified translation of the Judgment issued by the San Juan Superior Court in Civil Case No. SJ024CV08617 on or before September 26, 2024.

THEREFORE, Plaintiffs respectfully request the Honorable Court to consolidate the Preliminary Injunction with the Trial on the Merits set for this Friday, September 27, 2014, at 10:00 a.m.

Dated: September 25, 2024.
San Juan, Puerto Rico

Respectfully submitted:

/S/Guillermo J. Ramos Luiña
GUILLERMO J. RAMOS LUIÑA
USDC-PR 204007
PO Box 22763, UPR Station,
San Juan, PR 00931
Tel. (787) 620-0527
Fax (787) 620-0039
gramlui@yahoo.com

/S/ Fermín L. Arraiza-Navas
Fermín L. Arraiza-Navas
#215705
ACLU, Puerto Rico
farraiza@aclu.org
(787)966-3133

Lolimar Escudero Rodríguez *
PR SCt, RUA: 14,692
ACLU, Puerto Rico
LolimarER@aclu.org

Lcda. Annette Martínez Orabona
Executive Director
*American Civil Liberties Union
of Puerto Rico*
Union Plaza
416 Avenida Ponce de León, Suite 1105
San Juan, Puerto Rico 00918
Tel. (787) 753-9493
e-mail: Amartinez-Orabona@aclu.org

*Of Counsel

Adriel I. Cepeda Dericieux**
American Civil Liberties Union Foundation
915 15th St., NW
Washington, DC 20005
(202) 456-0800
acepedaderieux@aclu.org

Sophia Lin Lakin**
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
slakin@aclu.org

***Pro Hac Vice* Application to be filed

CERTIFICATION

I hereby certify that I filed the within document via the ECF system on September 25, 2024, and that it is available for viewing and downloading to all counsel of record.

/s/Fermín L. Arraiza-Navas
Fermín L. Arraiza-Navas